SHARON KELLY SAYERS

STATE OF NEW YORK
CITY COURT COUNTY OF MONROE

THE PEOPLE OF THE STATE OF NEW YORK

vs

ADDENDUM TO
DEMAND FOR DISCOVERY

SUSAN DAVID,

Defendant.

PLEASE TAKE NOTICE, that pursuant to Criminal Procedure Law §240.20, the above named Defendant, hereby demands that the prosecution disclose to the Defendant, and make available for inspection, photographing, copying or testing the following property:

A. Any written report, document, or listing of any and all complaints received by the City of Rochester Police Department or Monroe County Sheriff's Office within two years and two months prior to the arrest date of Defendant of June 24, 1989, as to acts by Defendant in connection with exposing her torso and or the act of breast feeding.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPL §240.35 and 240.80(2), any refusal by the district attorney to disclose information upon the grounds that it is believed not discoverable by this demand or that a protective order would be warranted must be made and served upon defense counsel within fifteen (15) days of the service of this demand, must be in writing, and must set forth the grounds of such belief as fully as possible.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPL §240.80(3), absent a refusal by the district attorney to comply with this demand, compliance with this demand must be made within fifteen (15) days of the service of this demand.

Dated: August 15, 1989
Rochester, New York 14614

Yours, etc.,

SHARON KELLY SAYERS, ESQ.
30 West Broad Street-Suite 100
Rochester, New York 14614

TO: HOWARD R. RELIN
Monroe County District Attorney

ANNE E. CHASE, ESQ.
Assistant District Attorney
201 Hall of Justice
Rochester, New York 14614